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Attorneys for Plaintiffs and the Putative Class

[ADDITIONAL COUNSEL LISTED ON SIGNATURE PAGE]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

LD, DB, BW, RH, and CJ on behalf of  
themselves and all others similarly situated,

Plaintiff,

v.

UNITEDHEALTHCARE INSURANCE  
COMPANY, a Connecticut Corporation,  
UNITED BEHAVIORAL HEALTH, a  
California Corporation, and MULTIPLAN,  
INC., a New York Corporation,

Defendant.

Case No. 5:20-cv-02254-YGR

Hon. Yvonne Gonzalez Rogers

**[PROPOSED] ORDER AND  
STIPULATION REGARDING BRIEFING  
SCHEDULE**

**STIPULATION**

The parties in the above-referenced case, by and through their counsel of record, hereby stipulate as follows:

1. WHEREAS Plaintiffs' deadline to file a standard of review motion is currently September 22, 2021, based on the stipulation entered by this Court on September 1, 2021 (D.E. 88); and

2. WHEREAS both sides have made supplemental productions, as provided in the September 1 stipulation; and

3. WHEREAS Plaintiffs have objected to redactions of certain documents produced by UHC on September 17, 2021; and

4. WHEREAS the parties request a short additional extension of the standard of review briefing schedule, so that they can complete their meet and confer process and try to resolve the open issues related to redactions; and

5. WHEREAS the parties agree that resolving these redaction issues before Plaintiffs' filing of their motion regarding the standard of review would promote efficiency and be in the interest of justice; and

6. WHEREAS, the parties have met and conferred and have agreed and stipulate to a revised briefing schedule regarding the standard of review, as set forth below:

NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel and subject to the Court's approval that:

1. The Parties will resolve the redaction issues by September 30, 2021

2. Plaintiffs' motion regarding the applicable standard of review shall be filed on or before October 6, 2021;

3. Defendants' opposition shall be filed on or before October 27, 2021;

4. Plaintiffs' reply brief shall be filed on or before November 3, 2021;

5. Motion hearing dates are to be decided by the Court based on the Court's schedule.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: September 22, 2021

**ARNALL GOLDEN GREGORY LLP**

/S/ MATTHEW M. LAVIN

By: MATTHEW M. LAVIN  
AARON R. MODIANO

*Attorneys for Plaintiffs and the Putative Class*

Dated: September 22, 2021

**DL LAW GROUP**

/S/ KATIE J. SPIELMAN

By: DAVID M. LILIENSTEIN  
KATIE J. SPIELMAN

*Attorneys for Plaintiffs and the Putative Class*

Dated: September 22, 2021

**GIBSON, DUNN & CRUTCHER, LLP**

/S/ GEOFFREY SIGLER

By: LAUREN M. BLAS  
GEOFFREY SIGLER

*Attorneys for Defendants, UnitedHealthcare Insurance Company and United Behavioral Health*

Dated: September 22, 2021

**PHELPS DUNBAR LLP**

/S/ ERROL J. KING

By: ERROL J. KING  
CRAIG L. CAESAR

*Attorneys for Defendant, MultiPlan*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2  
3  
4 DATED: \_\_\_\_\_

\_\_\_\_\_  
Hon. Yvonne Gonzalez Rogers

**ATTESTATION**

Pursuant to Civil Local Rule 5-1, I, Katie J. Spielman, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the stipulation's content and have authorized the stipulation.

Dated: September 22, 2021

By: /s/ Katie J. Spielman  
Katie J. Spielman